

REMARKS**I. General**

Claims 1-3, 5-16, and 18-25 are pending in the current application. Claims 1-3, 5-16, and 18-25 are rejected. The issues raised in the Office Action mailed January 21, 2004 are:

- Claims 1-3, 5-7, and 22-25 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent No. 6,437,786 to Yasukawa (hereinafter *Yasukawa*) further in view of U.S. Patent No. 5,465,174 to Sprotberry (hereinafter *Sprotberry*) and U.S. Patent No. 6,554,431 to Binsted et al. (hereinafter *Binsted*); and
- Claims 8-16 and 18-21 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over *Yasukawa* further in view of U.S. Patent No. 6,044,178 to Lin (hereinafter *Lin*) and U.S. Patent No. 6,069,707 to Pekelman (hereinafter *Pekelman*).

II. Claim Amendments

Claim 22 is amended to delete “said” from the second element in order to clarify that the presentation data received from the scanning apparatus is not the same presentation data received over the bi-directional network connection. In addition, claim 22 is amended to recite aspects related to the presentation data received from the scanning apparatus as comprising images embodied on flat media as noted on page 10. No new matter is added by the claim amendments.

III. Rejection under 35 U.S.C. § 103(a) –*Yasukawa, Binsted, & Sprotberry*

The Examiner rejects claims 1-3, 5-7, and 22-25 under 35 U.S.C. § 103(a) as being unpatentable over *Yasukawa* further in view of *Binsted* and *Sprotberry*. Applicant respectfully traverses the rejection and asserts that the rejected claims are allowable at least for the reasons stated below.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), the prior art cited must teach or suggest all the claim limitations. MPEP § 2143. Applicant respectfully

asserts that the cited references do not teach or suggest all the claim limitations of claims 1-3, 5-7, and 22-25, and therefore, the claims are patentable under 35 U.S.C. § 103(a).

Failure to teach or suggest all claim limitations

A. Independent Claims

Claim 1

Claim 1 requires, in part:

a flatbed scanner within said single container for providing scanned data to said projection system.

The cited references fail to disclose this element. The Examiner concedes that *Yasukawa* fails to teach a flatbed scanner within a single container for providing scanned data to the projection system. (Current Office Action, page 3). Thus, the Examiner relies on both *Binsted* and *Sprotbrey* as disclosing this element. However, neither *Binsted* nor *Sprotbrey* teach or suggest a flatbed scanner as required by claim 1.

Binsted discloses an image projection apparatus for projecting an image on a moving three-dimensional curved surface wherein the apparatus includes a position detection portion, a projection portion, and a control portion. (*Binsted*, col. 1, lns 32-42). The image projection apparatus includes a camera which is used as an image pickup device for detecting the position and orientation of the curved surface of the object on which an image is to be projected. (*Binsted*, col. 2, lns 20-25). The camera may be a CCD image pickup device formed of a two-dimensional array of several charge coupled devices (CCDs) used as image pickup elements. (*Binsted*, col. 2, lns 55-60). However, the camera is not a flatbed scanner, as required by claim 1. Furthermore, the disclosure of a camera to detect position and orientation does not teach or suggest a flatbed scanner for providing scanned data to the projection system wherein the flatbed scanner is within the same container as the network interface and projection system. Thus, *Binsted* fails to disclose a flatbed scanner within the same container as a network interface and a projection system as required by claim 1.

The Examiner also asserts *Sprotbrey* as disclosing a flatbed scanner. *Sprotbrey* discloses a single light valve projector that is operative to display an image on a screen in

response to first and second video signals. (*Sprotberry*, col. 2, lns 37-40). The single light valve projector includes a scanning control circuit and a raster scanner that scans a liquid crystal light valve with a writing beam in order to record input video information.

(*Sprotberry*, col. 3, lns 24-30). Thus, a raster scanner is not the same thing a flatbed scanner. Moreover, *Sprotberry* teaches that the raster scanner is operative to sequentially deflect a beam across an input layer wherein a scanning network causes the deflected beam to illuminate a second set of areas on the input layer in response to a second video signal. (*Sprotberry*, col. 2, lns 51-56). However, the disclosure of a raster scanner to deflect a beam supplied by a laser diode does not suggest or teach a flatbed scanner within the single container for providing scanned data to the projection system, as required by claim 1. Furthermore, the mere disclosure of some type of scanner, such as a raster scanner, does not teach or suggest a flatbed scanner.

The Examiner also relies on Figures 1 and 2 in rejecting claim 1. (Current Office Action, page 3). Figure 1 represents a block diagram of a single light valve full-color image projection system that includes block (24) that represents a raster scanner. (*Sprotberry*, Fig. 1). Figure 2 represents a block diagram of the components of the raster scanner used in the projection system. (*Sprotberry*, Fig. 2). However, a simple block with wording that represents a raster scanner and the components of a raster scanner does not teach or suggest a flatbed scanner. Thus, *Sprotberry* also fails to disclose a flatbed scanner within the same container as a network interface and a projection system as required by claim 1. Therefore, no combination of *Yasukawa*, *Binstead*, or *Sprotberry*, discloses all the elements of claim 1, and therefore, Applicant respectfully requests that the rejection of claim 1 under 35 U.S.C. § 103 be withdrawn.

Claim 22

Claim 22 requires, in part:

means at said portable system for receiving presentation data from a scanning apparatus within said portable system, wherein said presentation data received from said scanning apparatus comprises images embodied on flat media.

The Examiner concedes that *Yasukawa* fails to teach this element. (Current Office Action, page 10). Thus, the Examiner relies on both *Binsted* and *Sprotberry* as disclosing this

element. The Examiner asserts that *Binsted* teaches a camera as an image pickup device where the camera and projector are disposed in a single container for providing presentation data to the projection system. However, the camera of *Binstead* operates to detect the position and orientation of a curved surface of an object on which an image is to be projected. (*Binsted*, col. 2, lns 20-24). The detection of position and orientation of a curved surface is not a means for receiving presentation data. Furthermore, the use of a camera to detect position and orientation of a curved surface does not disclose a means for receiving presentation data from a scanning apparatus wherein the presentation data received from the scanning apparatus comprises images embodied on flat media. Therefore, *Binsted* fails to disclose this element of claim 22.

The Examiner also asserts *Sprotberry* as teaching a scanner and projector disposed in a single portable container. (Current Office Action, page 10). In making this assertion, the Examiner references Figures 1 and 2 and column 4. Figure 1 represents a block diagram of a single light valve full-color image projection system that includes block (24) that represents a raster scanner, and Figure 2 represents a block diagram of the components of the raster scanner used in the projection system. (*Sprotberry*, Figs. 1 & 2). However, a block diagram of a raster scanner does not disclose a means for receiving presentation data from a scanning apparatus, wherein said presentation data received from said scanning apparatus comprises images embodied on flat media. Furthermore, *Sprotberry* teaches that the raster scanner is operative to sequentially deflect a beam across an input layer wherein a scanning network causes the deflected beam to illuminate a second set of areas on the input layer in response to a second video signal. (*Sprotberry*, col. 2, lns 51-56). However, the disclosure of a raster scanner to deflect a beam supplied by a laser diode does not suggest or teach a means for receiving presentation data from a scanning apparatus, wherein the presentation data received from the scanning apparatus comprises images embodied on flat media. Thus, *Sprotberry* also fails to disclose this element of claim 22. Therefore, no combination of *Yasukawa*, *Binstead*, or *Sprotberry*, discloses all the elements of claim 22, and therefore, Applicant respectfully requests that the rejection of claim 22 under 35 U.S.C. § 103 be withdrawn.

B. Dependent Claims

Claims 2, 3, 5-7, and 23-25 depend directly or indirectly from their respective base claims 1 and 22 and thereby inherit all of the limitations of their respective base claims. Accordingly, it is respectfully submitted that the dependent claims are allowable based on at least their dependency from independent base claims 1 and 22 for at least the reasons discussed above. Thus, Applicant respectfully submits that based on the arguments above, claims 2, 3, 5-7, and 23-25 are patentable under 35 U.S.C. §103.

IV. Rejection under 35 U.S.C. §103 (a)—*Yasukawa, Lin, & Pekelman*

The Examiner rejects claims 8-16 and 18-21 as being unpatentable over *Yasukawa* further in view of *Lin* and *Pekelman*. Applicant respectfully traverses the rejection and asserts that the rejected claims are allowable at least for the reasons stated below.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a), the prior art cited must teach or suggest all the claim limitations. MPEP § 2143. Applicant respectfully asserts that the cited references do not teach or suggest all the claim limitations of claims 8-16 and 18-21, and therefore, the claims are patentable under 35 U.S.C. § 103(a).

Incorrect Claim Interpretation

The Examiner asserts that claim 8 does not require the scanner and the projection system to be disposed within the single apparatus. (Current Office Action, page 13). However, this interpretation by the Examiner is incorrect. Claim 8 requires that the steps of accessing a media access site, downloading an image from the media access site, and projecting of the downloaded images all be performed by employing a single apparatus. Claim 8 also requires that the optical scanner used for acquiring of presentation data be disposed within the same single apparatus. Thus, claim 8 clearly requires that the single apparatus include the optical scanner and be employed for performing the accessing, downloading, and projecting as discussed above. As such, the Applicant respectfully requests the Examiner to re-examine claim 8 using the correct interpretation of claim 8 discussed above.

Failure to teach or suggest all claim limitations**A. Independent Claim****Claim 8**

Claim 8 requires, in part:

performing said steps of accessing, downloading, and projecting employing a single apparatus...

acquiring presentation data from an optical scanner disposed within said single apparatus.

With respect to the Examiner's interpretation and rejection, the cited references fail to teach all the elements of claim 8. *Yasukawa* is a network projector "structured by servers, a projector, and a network which connects to the servers and the projector." (*Yasukawa*, abstract). In addition, *Yasukawa* discloses a projector (31) connected to a network consisting of a plurality of servers (32A) through some type of communication cable. (*Yasukawa*, col. 10, lns 13-24). However, the projector of *Yasukawa* is connected to a network which does not define projecting or acquiring presentation data from an optical scanner within the single apparatus.

The Examiner attempts to cure the deficiencies of *Yasukawa* by providing an optical scanner through the teachings of *Lin* and *Pekelman*. However, *Lin* only teaches a scanner as a separate portion of an image handling unit. (*Lin*, col. 3, ln 35 to col. 4, ln 31; Figs. 1A, 1B, & 1C). Thus, *Lin* also fails to disclose the projecting and acquiring of presentation data from an optical scanner both within the same single apparatus as required by claim 8. Furthermore, *Pekelman* is merely used by the Examiner to disclose a flatbed optical scanner that discloses scanning images to be processed by an image processor. (Current Office Action, page 6). However, *Pekelman*'s disclosure of an optical scanner also fails to disclose the projecting and acquiring of presentation data from an optical scanner both within the same single apparatus, as required by claim 8. Therefore, the combination of *Yasukawa*, *Lin*, and *Pekelman* fails to disclose each and every element of claim 8. Therefore, the Applicant respectfully requests that the rejection of claim 8 under 35 U.S.C. § 103 (a) be withdrawn.

B. Dependent Claims

Claims 9-16 and 18-21 depend directly or indirectly from base claim 8 and thereby inherit all of the limitations of the base claim. Accordingly, it is respectfully submitted that the dependent claims are allowable based on at least their dependency from independent base claim 8 for at least the reasons discussed above. Thus, Applicant respectfully submits that based on the arguments above, claims 9-16 and 18-21 are patentable under 35 U.S.C. §103.

V. Summary

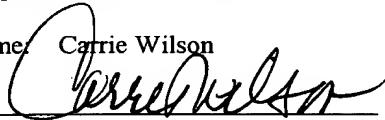
In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 08-2025, under Order No. 10004915-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail Label No. EV255079147US in an envelope addressed to: MS AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

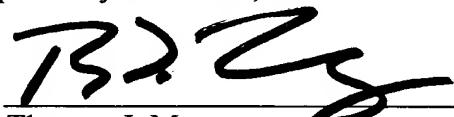
Date of Deposit: March 15, 2004

Typed Name: Carrie Wilson

Signature: 

Respectfully submitted,

By:



Thomas J. Meaney
Attorney/Agent for Applicant(s)
Reg. No. 41,990
Date: March 15, 2004
Telephone No. (214) 855-8230